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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant	: Lynn, et al.	Art Unit	: 2178
Serial No.	: 09/658,742	Examiner	: Jonathan D. Schlaifer
Filed	: September 11, 2000		
Title	: SMART CORNER MOVE SNAPPING		

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

BRIEF ON APPEAL

(1) Real Party in Interest

The real party in interest is Adobe Systems Incorporated.

(2) Related Appeals and Interferences

None.

(3) Status of Claims

Claims 1-2 and 4-19 are pending. Claim 3 has been cancelled. Claims 1-2 and 4-19 stand rejected. Applicant appeals claims 1-2 and 4-19.

(4) Status of Amendments

There are no unentered amendments.

(5) Summary of Claimed Subject Matter

A page structural element is a page object to be laid out in an electronic document displayed by a display device, and includes a frame demarcating its region, graphic data or text data to be included in the frame. See Specification, page 6, lines 24-27. The page structural

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SUBMISSION OF APPEAL BRIEF

Further to the Notice of Appeal filed and received in the U.S. Patent Office on January 14, 2005, the Applicant submits herewith an Appeal Brief, and a check in the amount of $500.00 for the Appeal Brief fee.

Please apply any other charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: 3 March, 2005

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element also includes multiple attraction points. *See* Specification, page 6, line 27. Multiple attraction points are also arrayed on the electronic document. *See* Specification, page 6, lines 32.

When the page structural element is displayed on the display device, the user can position the page structural element at a desired location on the electronic document. *See* Specification, page 6, lines 28-30. The attraction points of the page structural element are attracted to the attraction points of the electronic document when the page structural element is moved. *See* Specification, page 6, line 33 to page 7, line 2. An attraction state control allows for only one of the multiple attraction points of the page structural element to be attractive while the other attraction points are non-attractive. *See* Specification, page 7, lines 3-11.

A layout editing system for arranging page structural elements in an electronic document is provided. *See* Specification, page 2, lines 8-9. The layout editing system includes a display device, a first supply device, a second supply device, and an attraction state control. *See* Specification, page 2, lines 9-11. The first supply device provides an electronic document having a plurality of first attraction points on a grid to the display device. *See* Specification, page 2, lines 11-13. The second supply device provides a page structural element on the electronic document. *See* Specification, page 2, lines 13-15. The page structural element has a plurality of second attraction points to adjust a position of the page structural element. *See* Specification, page 2, lines 15-17. The movement device moves the page structural element without deformation to a desired location in the electronic document in response to a manual user operation. *See* Specification, page 2, lines 17-18. The attraction state control controls attraction of the plurality of second attraction points that can be activated so that only a single one of the plurality of second attraction points is attractive to snap the page structural element to a first attraction point while the page structural element is being moved by the movement device. *See* Specification, page 2, lines 17-21; page 10, lines 17-31; page 12, lines 18-24; FIGS. 5A-5C.

The movement device can include a cursor displayed on the display device. *See* Specification, page 2, lines 23-29. The attraction state control can activate only a single second attraction point nearest to the cursor as attractive when the page structural element is being held by the movement device. *See* Specification, page 2, lines 26-29.

Additionally, a layout editing method and an apparatus with a computer-readable storage medium tangibly embodying program instructions for arranging page structural elements in an

electronic document are provided. *See* Specification, page 3, lines 4-5 and 26-28. An electronic document having a plurality of first attraction points arranged on a grid is displayed. *See* Specification, page 3, lines 5-7. A page structural element having a plurality of second attraction points is also displayed. *See* Specification, page 3, lines 7-9. A single one of the plurality of second attraction points is activated such that only a single second attraction point nearest to a cursor is in an attractive state. *See* Specification, page 3, lines 12-14; FIG. 8B. The cursor position is detected when a button of a pointing device linked to the cursor is pressed down. *See* Specification, page 3, lines 10-12. When the pointing device is operated in a holding state and the cursor is moved, linking the page structural element to movement of the cursor and moving the page structural element without deformation such that the single second attraction point is attractive to snap the page structural element to a first attraction point. *See* Specification, page 3, lines 16-19; page 10, lines 17-31; page 11, lines 25-30; FIGS. 5A-5C.

A layout editing system for arranging page structural elements in an electronic document is also provided. *See* Specification, page 3, lines 30-31. The layout editing system includes a display, a memory, a moving device, and a processor. *See* Specification, page 3, lines 31-32. The memory stores an electronic document and a page structural element to be output on the display. *See* Specification, page 3, lines 32-33. The electronic document and the page structural element are as described in the above layout editing system. *See* Specification, page 3, line 33 to page 4, line 1. The processor is configured to adjust a position of the page structural element, without deformation, on the display in response to user operation of the movement device such that at least one of the plurality of first attraction points tends to align with at least one of the plurality of second attraction points. *See* Specification, page 4, lines 2-6. The processor is further configured to control the attraction of the plurality of second attraction points that can be activated such that only a single one of the plurality of second attraction points is attractive to snap the page structural element to a first attraction point while the page structural element is being moved by the movement device. *See* Specification, page 4, lines 6-8; page 10, lines 17-31; page 12, lines 18-24; FIGS. 5A-5C.

(6) Grounds of Rejection

Claims 1-2, 7, 10, 13-14, and 18-19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over "Microsoft Word: User's Guide," Version 6.0, 1993-1994 ("Microsoft Word: User's Guide") in view of U.S. Patent No. 5,444,836 to Hollingsworth ("Hollingsworth").

Claims 4-6, 8-9, 11-12, and 15-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Microsoft Word: User's Guide in view of Hollingsworth and further in view of U.S. Patent No. 5,175,806 to Muskovitz et al. ("Muskovitz").

(7) Argument

I. Rejection under 35 U.S.C. § 103(a) as being unpatentable over Microsoft Word: User's Guide in view of Hollingsworth

Claim 1

Claims 1 stands rejected as being unpatentable over Microsoft Word: User's Guide in view of Hollingsworth. Claim 1 recites an attraction state control for controlling the activation of multiple second attraction points. Additionally, claim 1 recites moving a page structural element without deformation, during which, "only a single one of the plurality of second attraction points is attractive to snap the page structural element to a first attraction point while said page structural element is being moved."

The Examiner concedes that Microsoft Word: User's Guide fails to disclose or suggest moving, without deformation, a page structural element having a plurality of attraction points where only a single attraction point is selected as attractive.

Hollingsworth also fails to disclose or suggest moving, without deformation, a page structural element having a plurality of attraction points where only a single attraction point is selected as attractive. The Examiner states that Hollingsworth discloses the recited feature of claim 1 at col. 1, lines 35-51. Applicant respectfully disagrees. Those lines of Hollingsworth read as follows:

> In the use of most CAD systems, the user identifies the placement position, placement angle, size, and other graphical attributes of each graphical object. In some applications of such CAD systems the placement of graphical objects with respect to one another is not critical. In such situations, simple freehand drawing by the user may be sufficient to place one graphical object visually near another

> graphical object. When more precision is required in the relative placements of graphical objects, a common approach in CAD systems is to force a graphical object to "snap to" a nearby grid location. Snapping serves to automatically reposition a graphical object to align a point on the object with a nearby standard grid location. This method helps assure that all graphical objects have a similar relationship to standard dimensional grid positions on the graphical image.

The quoted section of Hollingsworth discloses a snap-to-grid system. Hollingsworth discloses that snapping serves to "align a point on the object with a nearby standard grid location." This does not teach or suggest that the aligned point is the only active attraction point set as attractive from a plurality of attraction points on a page structural element, which corresponds to Hollingsworth's graphical object. In a typical snap-to-grid system, a page structural element can be snapped to a page grid such that one or more attraction points on the object are snapped to one or more attraction points on the grid. *See* Specification page 1, lines 18-25. Because a page structural element can have a size or shape that does not necessarily match the grid layout, not every attraction point will snap to the page grid, but all of the attraction points for the page element will be attractive to snap to the page grid. By snapping a point of the object onto a grid, the page structural element can be aligned with on more grid lines.

Hollingsworth fails to disclose or suggest a page structural element having multiple attraction points that can be activated as attractive or non-attractive. Hollingsworth does not disclose or suggest any distinction between attraction points having an attractive or non-attractive state. Additionally, no disclosure or suggestion is made in Hollingsworth that the page structural element has attraction points that are activated as attractive when moving the page structural element while other attraction points on the page structural element are not set as attractive. Therefore, Hollingsworth fails to disclose activating a single attraction point, of a plurality of attraction points, as attractive when moving a page structural element without deformation to a location on a grid.

Applicant respectfully submits that claim 1, as well as claims 2, 4-6, and 18-19, which depend from claim 1, are allowable.

Claim 7

Claim 7 stands rejected as unpatentable over Microsoft Word: User's Guide in view of Hollingsworth. Claim 7 recites a layout editing method that includes moving a page structural element without deformation such that only a single one of multiple attraction points of the page structural element is in an attractive state to snap the object to an attraction point on a grid. For at least the same reasons set forth above with respect to claim 1, claim 7 as well as claims 8-9, which depend from claim 7, are allowable.

Claim 10

Claim 10 stands rejected as unpatentable over Microsoft Word: User's Guide in view of Hollingsworth. Claim 10 recites instructions causing a computer to move a page structural element without deformation such that only a single second attraction point of multiple attraction points on the page structural element is activated as attractive to snap the page structural element to a first attraction point on the grid. For at least the same reasons set forth above with respect to claim 1, claim 10 as well as claims 11-12, which depend from claim 10, are allowable.

Claim 13

Claim 13 stands rejected as unpatentable over Microsoft Word: User's Guide in view of Hollingsworth. Claim 13 recites a layout editing system that adjusts the position of a page structural element without deformation such that only a single one of the plurality of second attraction points is attractive to snap the page structural element to a first attraction point while the page structural element is being moved. For at least the same reasons set forth above with respect to claim 1, claim 13 as well as claims 14-17, which depend from claim 10, are allowable.

II. Rejection under 35 U.S.C. § 103(a) as being unpatentable over Microsoft Word: User's Guide in view of Hollingsworth and further in view of Muskovitz

Claim 6

Claim 6 stands rejected as being unpatentable over Microsoft Word: User's Guide in view of Hollingsworth and further in view of Muskovitz. Claim 6 recites a page structural

element where only a single attraction point, of multiple attraction points, of the page structural element nearest to a cursor is attractive.

The Examiner contends that page 387 of Microsoft Word: User's Guide discloses the recited feature of claim 6. Applicant respectfully disagrees. Page 387 of Microsoft Word: User's Guide discloses using a cursor to select a single handle on a drawing object and dragging the handle in order to resize or otherwise deform the drawing object. However, Microsoft Word: User's Guide does not disclose using a cursor to select only a closest attraction point, of a page structural element's multiple attraction points, as attractive when the page structural element is moved without deformation by the movement device. Therefore, Microsoft Word: User's Guide does not disclose or suggest moving the page structural element having multiple attraction points without deformation where only a single attraction point of the page structural element closest to the cursor is set as attractive. For at least the foregoing reasons, as well as the reasons set forth with respect to claim 1, Applicant respectfully submits that claim 6 is allowable.

The brief fee of $500 is enclosed. Please apply any other charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: 3 March, 2005

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Appendix of Claims

Pending Claims for 09/658,742

1. A layout editing system for arranging page structural elements in an electronic document, comprising:

a display device;

a first supply device to provide an electronic document having a plurality of first attraction points arranged on a grid to the display device;

a second supply device to provide a page structural element on the electronic document the page structural element having a plurality of second attraction points to adjust a position of the page structural element;

a movement device to move said page structural element without deformation to a desired location in said electronic document in response to a manual user operation; and

an attraction state control to control attraction of the plurality of second attraction points that can be activated so that only a single one of the plurality of second attraction points is attractive to snap the page structural element to a first attraction point while said page structural element is being moved by said movement device.

2. The layout editing system of claim 1, wherein said movement device comprises a pointing device, and said page structural element is kept in a held state by keeping said pointing device's button pressed down.

3. (Cancelled)

4. The layout editing system of claim 1, further comprising an attractive operation mode setting mechanism to selectively set a first attractive operation mode that sets a state of attracting to all of said plurality of first attraction points, and a second attractive operation mode that sets a state of attracting only to a selected predetermined pattern within said plurality of first attraction points.

5. The layout editing system of claim 4, wherein said attractive operation mode setting mechanism comprises a predetermined specified key on the keyboard, and said second attractive operation mode is set by holding said specified key pressed down.

6. The layout editing system of claim 1, wherein said movement device comprises a cursor displayed on said display device, and said attraction state control activates only a single second attraction point nearest to said cursor attractive when said page structural element is being held by said movement device.

7. A layout editing method for arranging page structural elements in an electronic document, comprising:

displaying an electronic document having a plurality of first attraction points arranged on a grid;

displaying a page structural element on the electronic document, the page structural element having a plurality of second attraction points;

holding said page structural element and activating a single one of the plurality of second attraction points such that only a single second attraction point nearest to a cursor is in an attractive state, and wherein a button of a pointing device linked to the cursor is pressed down at the time of detecting the cursor position; and

when said pointing device is operated in a holding state and said cursor is moved, linking the page structural element to movement of said cursor and moving said page structural element without deformation such that the single second attraction point is attractive to snap the page structural element to a first attraction point.

8. The layout editing method of claim 7, further comprising the step of selecting a first attractive operation mode that sets a state of attracting to all of said plurality of first attraction points, and a second attractive operation mode that sets a state of attracting only to a selected predetermined pattern within said plurality of first attraction points.

9. The layout editing method of claim 8, wherein said first or second attractive operation mode is selected depending on whether a predetermined specified key on the keyboard is pressed down or released respectively.

10. An apparatus comprising a computer-readable storage medium tangibly embodying program instructions for causing a computer to:

display an electronic document having a plurality of first attraction points arranged on a grid;

display a page structural element on the electronic document, the page structural element having a plurality of second attraction points;

hold said page structural element and activating a single one of the plurality of second attraction points such that only a single second attraction point nearest to a cursor is in an attractive state, wherein a button of a pointing device linked to the cursor is pressed down at a time of detecting the cursor position; and

when said pointing device is operated in a holding state and said cursor is moved, link the page structural element to movement of said cursor and move said page structural element without deformation such that the single second attraction point is attractive to snap the page structural element to a first attraction point.

11. The apparatus of claim 10, further comprising instructions to cause the computer to select one of a first attractive operation mode and a second attractive operation mode, the first attractive operation mode setting a state of attracting to all of said plurality of first attraction points, the second attractive operation mode setting a state of attracting only to a selected predetermined pattern within said plurality of first attraction points.

12. The apparatus of claim 11, wherein said first or second attractive operation mode is selected depending on whether a predetermined specified key on the keyboard is pressed down or released respectively.

13. A layout editing system for arranging page structural elements in an electronic document, comprising:

a display;

a memory that stores an electronic document and a page structural element to be output on the display, the electronic document having a plurality of first attraction points arranged on a grid, the page structural element having a plurality of attractive second attraction points;

a movement device; and

a processor coupled to the memory, the display and the movement device, the processor configured to adjust a position of the page structural element, without deforming the page structural element, on the display in response to user operation of the movement device such that at least one of the plurality of first attraction points tends to align with at least one of the plurality of second attraction points, the processor further configured to control the attraction of the plurality of second attraction points that can be activated such that only a single one of the plurality of second attraction points is attractive to snap the page structural element to a first attraction point while said page structural element is being moved by the movement device.

14. The layout editing system of claim 13, wherein the movement device comprises a pointing device, and the processor is configured to cause the only one second attraction point to be selected when a button on the pointing device is pressed.

15. The layout editing system of claim 14, wherein the processor is configured to operate in one of a first attractive operation mode and a second attractive operation mode, wherein in the first attractive operation mode the processor sets a state of attracting to all of said plurality of first attraction points, and in the second attractive operation mode the processor sets a state of attracting only to a selected predetermined pattern within said plurality of first attraction points.

16. The layout editing system of claim 13, further comprising a keyboard, and wherein the processor selects one of the first and second attractive operation modes based on user input on the keyboard.

17. The layout editing system of claim 13, wherein said movement device comprises a cursor displayed on said display device, and the processor is configured to activate only a single second attraction point nearest to said cursor attractive when the page structural element is being held by said movement device.

18. The layout editing system of claim 1, wherein the page structural element is demarcated by a frame.

19. The layout editing system of claim 18, wherein said movement device comprises a cursor displayed on the display device, and the attraction state control activates only a single second attraction point nearest to the cursor attractive when the cursor is positioned inside the page structural element frame and the page structural element is being held by the movement device.